



U.S. Department  
of Transportation  
Federal Aviation  
Administration

# Memorandum

Subject: **INFORMATION**: Policy Statement; Installation of  
Electronic Engine Control for Reciprocating Engine;  
PS-ACE100-2004-10024

Date: DRAFT

From: Manager, Small Airplane Directorate, ACE-100

Reply to Peter Rouse  
Attn. of: (816) 329-4135

To: SEE DISTRIBUTION

## 1. Summary

The purpose of this policy statement is to help identify appropriate certification requirements for installation of an Electronic Engine Control (EEC) into a small airplane with a reciprocating engine. It includes guidance related to methods of compliance as well as potential Equivalent Level of Safety findings (ELOS) and special conditions.

The EEC must be approved for use on a certificated engine per 14 CFR, part 33 before installation in a 14 CFR, part 23 airplane. The EEC part 33 approval can be through a Supplemental Type Certificate (STC) or Amended Type Certificate (ATC) process. This policy statement addresses the certification requirements for the installation of an EEC that has been approved for use on a part 33 engine into a part 23 airplane.

Installation of an EEC into part 23 airplanes may include design features not envisioned when 14 CFR, part 23 was created. This policy highlights areas where special conditions may be appropriate for these installations. However, appropriate special conditions for each installation must be determined on a case-by-case basis in accordance with 14 CFR, part 21, § 21.16, § 21.17, and 14 CFR, part 11.

Installing an EEC in a small certificated airplane design is not considered a design change so substantial that it would require a new airplane Type Certificate (TC) under 14 CFR, part 21, § 21.19. Therefore, it is considered appropriate to install an approved EEC into a certificated airplane using the STC or ATC process.

Proposed EEC installations, whether supplemental, amended, or new TC projects, will be considered significant as defined in Order 8100.5, paragraph 103j.

Note: Federal Aviation Administration (FAA) Order 8100.5 has been cancelled and Order 8100.5A has been issued; however, the definition of “significant” has been omitted in Order 8100.5A. Therefore, the reference to Order 8100.5 is necessary in order to define “significant.” See Figure 1 for the definition of “significant” from Order 8100.5.

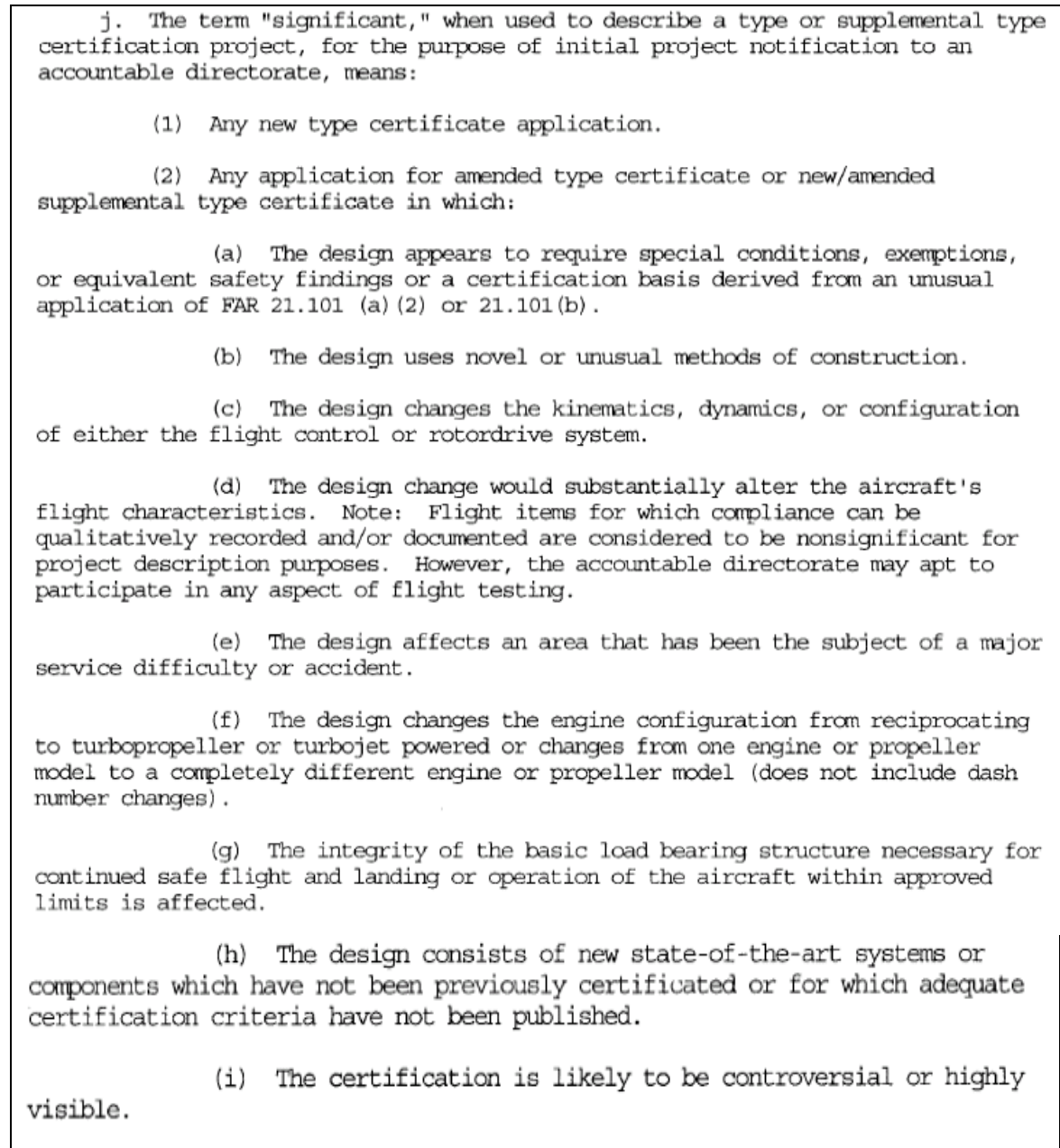


Figure 1. FAA Order 8100.5, Paragraph 103j

Given the significance of the change, early program coordination between the Standards Office and the Aircraft Certification Office (ACO) is necessary. The ACO is expected to notify the Standards Office of such projects promptly and

forward certification project notifications and associated certification plans as soon as practical after project application. The ACO will identify the technological areas of concern identified in this policy statement, as well as any additional concerns, and develop a G-1 issue paper to establish the certification basis. Signature authority for certificate issuance on these projects is retained by the Standards Office and will be re-delegated on a case-by-case basis as this new technology is understood and integrated into aerospace products.

## **2. Discussion of Significant Issues**

### **a. General**

New technology for aircraft piston engines is being developed to enable the use of a Full Authority Digital Engine Control (FADEC) or EEC. Such systems are not unique to aircraft piston engines and are increasingly common on turbine engines and in the automotive world. The FADEC or EEC controls any combination of engine control subsystems such as fuel delivery, ignition, turbocharger boost, or propeller speed. This policy statement covers installing piston engine EECs.

### **b. Nomenclature**

EECs will be used to describe engine control systems that are software driven, regardless of whether they are full authority or supervisory over a mechanical system.

### **c. Installation Manual**

As part of the engine type certification effort, 14 CFR, part 33, § 33.5, requires that an instruction manual for installation and operation of the engine be prepared and approved before issuance of the engine TC. The requirement for an instruction manual for installation and operation of the engine is required regardless of the method of engine and EEC certification (new, amended, or supplemental type certificate). 14 CFR, part 23, § 23.901, requires that engine installations comply with these instructions. The applicable regulations identified in this policy statement (including potential special conditions), combined with the engine installation instructions, should provide a comprehensive list of installation requirements for most EEC installations. In addition, the methods of compliance and potential special conditions described in this policy statement should help applicants and ACO engineers when assessing methods to demonstrate compliance to applicable regulations.

Advisory Circular (AC) 33.28-2, "Guidance Material for 14 CFR 33.28, Reciprocating Engine, Electrical and Electronic Engine Control Systems," provides additional guidance on the physical and functional integration of the EEC into an airplane electronic control system. Specifically, Chapter 8 should be reviewed as it contains guidance regarding EEC integration into an airplane.

Following is an excerpt of AC 33.28-2, “Guidance Material for 14 CFR 33.28, Reciprocating Engine, Electrical and Electronic Engine Control Systems,” Chapter 8. The following excerpt specifically identifies the need for an additional interface document supplied by the EEC manufacturer describing interface requirements and certification requirements for these integrated systems. [Note: LOPC means Loss of Power Control and MPL means Minor Power Loss.]

## **CHAPTER 8. INTEGRATION OF ENGINE, PROPELLER, AND AIRCRAFT SYSTEMS**

### *8-1. EEC System Integration Certification Plan (SICP).*

*There must be a clear definition of the respective certification tasks of the various applicants: engine, propeller, and aircraft manufacturers, with the associated engine, propeller, and aircraft certification authorities. This should be documented in an EEC SICP, submitted by the applicant for engine certification. The plan should be included as an appendix to the instructions for installation and should include the following:*

*a. Distribution of Compliance Tasks. The tasks for the certification of the aircraft propulsion system equipped with electronic controls may be shared between the engine, propeller, and aircraft manufacturers. The distribution of these tasks between the manufacturers should be identified and agreed on by the appropriate engine, propeller, and aircraft authorities. The EEC SICP should summarize the engine applicant’s responsibilities for these certification tasks. The plan should list each task related to the EEC system certification and define those for which the engine applicant is responsible and those for which the aircraft or propeller applicant is responsible. The plan should address all analyses and tests required for EEC system certification.*

*b. Interface Definition and Other Data. The EEC SICP should include interface definitions and other data for the functional, hardware, and software aspects that have been integrated between the engine, propeller, and aircraft systems. The plan should describe integration aspects or provide cross-references to the instructions for installation for the following items:*

- (1) Functional requirements;*
- (2) Fault accommodation strategies;*
- (3) Maintenance strategies;*
- (4) Software quality level (per function if necessary);*
- (5) The reliability objectives for:*
  - (a) LOPC and MPL events; and*
  - (b) Transmission of faulty parameters.*
- (6) The environmental requirements, including the degree of protection against lightning or other electromagnetic effects (for example, the level of induced voltages that can be supported at the interfaces);*
- (7) Engine, propeller, and aircraft interface data and characteristics; and*
- (8) Aircraft electrical power supply requirements and characteristics (if relevant)*

*c. Design Change Control. The EEC SICP should describe the design change control system established to support post-certification activity. This system should ensure that changes to any control element that is integrated into the EEC system are evaluated by all design approval holders of that integrated system.*

### **3. Regulatory Review**

The following is the criteria for a special condition as defined in § 21.16:

*“If the Administrator finds that the airworthiness regulations of this subchapter do not contain adequate or appropriate safety standards for an aircraft, aircraft engine, or propeller because of a novel or unusual design feature of the aircraft, aircraft engine or propeller, he prescribes special conditions and amendments thereto for the product. The special conditions are issued in accordance with Part 11 of this chapter and contain such safety standards for the aircraft, aircraft engine or propeller as the Administrator finds necessary to establish a level of safety equivalent to that established in the regulations.”*

The policy statement refers to special conditions because of the new and novel features of EECs. The existing regulations did not envision the use of electronic engine controls; therefore, the existing regulations do not directly address the certification requirements necessary to achieve the appropriate safety standards equivalent to those currently used by aircraft propulsion systems.

The table in Appendix A is taken from 14 CFR, part 23 with an emphasis on the sections that require more consideration when incorporating an EEC for aircraft use. There are eleven potential special conditions identified in the text and in the regulations matrix that are included in Appendix A. The sections noted with an asterisk (\*) highlight requirements that may be applicable by special condition or may have more requirements applied by special condition. See the appropriate text paragraph describing the potential criteria for the special condition.

Appendix B contains an example of a special condition that has been applied to EEC installations.

### **4. Policy – Section Discussions**

#### **a. Part 21**

##### **(1) Primary Category**

An aircraft engine EEC design not approved under part 33 may not be approved as part of an airframe TC under a primary category approval. The intent

of primary category is a simple aircraft. The applicant may install an EEC equipped engine certified under part 33 in a primary category airplane.

## **(2) Airships**

The EEC policy is applicable for airship projects.

## **(3) § 21.113, Requirement of supplemental type certificate**

The EEC must be approved for use on a certificated engine per 14 CFR, part 33. The approved EEC can then be installed in a small airplane. The applicant may install a certificated aircraft engine EEC into a certificated airplane using either the STC or ATC process. The applicant may not install a certificated aircraft engine EEC into a certificated airplane through a field approval.

All proposed EEC installations, whether supplemental, amended, or new TC projects, will be considered significant as defined in Order 8100.5, paragraph 103j. The design requirements appropriate to the aircraft engine EEC and its systems justify this rationale.

## **b. Part 23**

### **(1) § 23.1, Applicability**

The applicant will need to apply for a project number for an EEC installation by providing a certification plan.

### **(2) Subpart B – Flight**

#### **(a) § 23.33, Propeller speed and pitch limits**

If the EEC controls propeller speed or pitch, incorporating an EEC would require complying with the applicable parts of this section. The failure modes of the EEC must also address any aspects of compliance with this section, such as propeller governing or overspeed protection, to ensure that no unsafe condition would be present.

Depending on the method of propeller control, an Issue Paper and an ELOS may be required to show compliance with § 23.33(d)(2). The most likely scenario would be a propeller governor that is integral to the EEC basic operation and was unable to be disabled without compromising the EEC basic operation. The applicant has to request an ELOS if the EEC control of the propeller uses a different means of controlling the engine overspeed rather than traditional methods such as reduced throttle settings.

**(b) §§ 23.45, 23.49, 23.53, 23.55, 23.57, 23.59, 23.61, 23.63, 23.65, 23.67, and 23.77**

The EEC may have operating modes in which the performance of the aircraft will be affected due to a change in available engine power. If the EEC has a negative effect on the aircraft performance, then the Subpart B performance has to be evaluated. A five percent effect on the engine power available has been the allowable limit where additional aircraft performance testing was not required as long as the changes were not detrimental to the aircraft performance. An increase in available engine power will not be detrimental to a single engine aircraft; however, it may have a negative effect on the minimum controllable airspeed for a multi-engine aircraft. Additionally, if the EEC does affect the idle thrust or the ability to achieve “zero thrust” due to minimum idle speeds, or mitigation for light polar moment of inertia propellers, then the applicant will have to evaluate the effects on the stall speeds and annotate the Airplane Flight Manual (AFM) accordingly.

**(3) Subpart C -- Structure**

**(a) §§ 23.301, 23.303, 23.305, 23.307, 23.321**

Basic compliance with the regulations is acceptable.

**(4) Subpart D -- Design and Construction**

**(a) §§ 23.601, 23.603, 23.605, 23.607, 23.609, 23.611, § 23.613**

Basic compliance with the regulations is acceptable.

**(b) §§ 23.777, 23.779, 23.781**

If either a single power lever or single power control is used, the applicant will need to request an ELOS using AC 23-17A guidance. The EEC may provide some or all of the combined control function. If this is the case, the EEC is to be identified and included within either an ELOS or special condition, as needed.

**(c) § 23.867, Electrical bonding and protection against lightning and static electricity**

Bonding, lightning protection, and static electricity are fundamental aspects of an EEC installation and must be addressed. If the EEC manufacturer provides installation instructions and approved substantiation data showing compliance with the requirements of § 23.867, then the applicant need not show additional compliance. Demonstration of compliance with this section

is required regardless of the type of intended operation: Visual Flight Rule (VFR) or Instrument Flight Rules (IFR), day or night.

## **(5) Subpart E -- Powerplant**

### **(a) § 23.901, Installation**

The EEC is a component of the engine installation under § 23.901(a). The EEC functions may only be dependent on engine components or sensors that were certified under part 33, or the EEC may require interface with additional components or sensors that need to be certificated as part of the powerplant system under part 23. The EEC installation certification requirements will vary according to the complexity of the EEC installation.

As part of the engine type certification effort, 14 CFR, part 33, § 33.5, requires that an instruction manual for installation and operation of the engine be prepared and approved before issuance of the engine TC. 14 CFR, part 23, § 23.901, requires that engine installations comply with these instructions. The installation instructions must include the interface requirements, with the applicable aircraft systems, and any fault strategies necessary. One example would be EEC reliance on an aircraft Air Data Computer (ADC) for engine power setting. The interface between the EEC and the ADC needs to be defined to include required data, data transmission rates and fault accommodations.

### **(b) § 23.903, Engines**

In addition to basic compliance with this regulation, the EEC installation must comply with the engine isolation requirements of § 23.903(c). Operation for five minutes with either an engine or nacelle fire is addressed during the engine part 33 certification where it is substantiated that the EEC does not take unwanted action that could be hazardous to the aircraft. The results from the engine part 33 certification should be used for compliance with this regulation.

If the engine affected by fire is not shut down within five minutes, it will be required to have a graceful shutdown, while the remaining engine(s), if any, continue to operate normally. A graceful shutdown is a shutdown that is benign and poses no hazard to the engine or the aircraft. The graceful shutdown refers to the failure modes of the EEC as the fire progresses. The graceful shutdown does not mean, in the event of a fire, that the EEC will automatically shut down the engine.

Additionally the restart envelope required by § 23.903(f) must be re-established, since the EEC may impact the restart capability of the engine.

The part 23 installation may require a software level that is higher than that certificated to date in part 33. AC 23.1309-1C shows the software requirements for the various classes of aircraft. The minimum software certification level for an EEC is DO178B level C; however, aircraft defined as Class III or higher will require DO178B level B software. If the EEC equipped engine is certified under 14 CFR, part 33 with DO178B level C software, then a higher software certification level would be required to install this engine into a 14 CFR, part 23 aircraft in the Class III category.

See the paragraph on § 23.1309 and AC 23.1309-1C for further clarification.

**(c) § 23.904, Automatic power reserve [APR] system**

The EEC will probably be a component of the APR system if such a system is available. The applicant will need to describe the operation of the APR system, as well as the triggering mechanisms.

**(d) § 23.907, Propeller vibration**

The EEC installation may affect the propeller vibration. An EEC may include control of fuel mixture and ignition timing. Both are known to affect the energy input to the crankshaft of a reciprocating engine. As a result, propeller vibration stress levels are also affected; therefore, evaluation of propeller vibration is required for a reciprocating engine EEC installation. The applicant is required to show that the EEC installation will not result in propeller vibration or strain levels that exceed the propeller manufacturer's limits.

**(e) § 23.909, Turbocharger systems**

EEC systems that include turbocharger control functions were evaluated during the part 33 engine certification. Only interface issues need to be addressed during the powerplant installation certification. Issues to address include the following: fault accommodation, annunciation, and guidance to the pilot in the event of a failure to minimize exceeding the limits (either overboost or overspeed) in failure conditions.

See the paragraph on § 23.1309 and AC 23.1309-1C for additional guidance.

**(f) § 23.933, Reversing systems**

An EEC may include control of the reversing system. This would be an integration issue that should be addressed in the System Integration Certification Plan (SICP) described in paragraph 2.c. of this policy statement. The EEC control of the reversing system must preclude the inadvertent in-flight

activation of the reversing system. The plan would need to include a description of the reversing system and identify all of the aircraft inputs and any EEC fault accommodations.

**(g) § 23.939, Powerplant operating characteristics**

The use of programmed schedules within an EEC may result in what was traditionally a non-critical operational aspect becoming the critical and limiting operation for certification. Consequently, flight test validation of acceptable engine operation throughout the altitude, temperature, power, and airspeed envelope by the applicant is fundamental for EEC installation certification. The regulation is currently required for turbocharged engines; however, the regulation will be applicable to normally aspirated engines via special condition.

**(h) § 23.955, Fuel flow**

Basic compliance with the regulations is acceptable.

**(i) § 23.991, Fuel pumps**

If the EEC system uses dual electric fuel pumps, instead of an engine driven pump, then the applicant must request an ELOS for compliance with § 23.991(a)(1).

Engines equipped with dual electric fuel pumps, will need permanent electrical power in the manner of Battery Ignition Systems, as addressed in § 23.1165. The minimum requirement for the electrical power system is addressed in §§ 23.1309, 23.1351, 23.1353, 23.1357, 23.1359, 23.1361, 23.1365 and 23.1367.

**(j) § 23.993, Fuel system lines and fittings**

Basic compliance with the regulations is acceptable.

**(k) § 23.997, Fuel strainer or filter**

Basic compliance with the regulations is acceptable.

**(l) § 23.1027, Propeller feathering system**

Basic compliance with the regulation is acceptable.

**(m) § 23.1041, General**

The EEC and its related components that have a maximum temperature limit defined must be evaluated for sufficient cooling once installed in the aircraft. The EEC control of the mixture on reciprocating engines will have an effect on the cooling performance. The applicant must identify any EEC mitigation strategies for engine cooling. One example would be the EEC's ability to use fuel mixture auto-enrichment on reciprocating engines for temperature control that would then affect the engine power available.

**(n) § 23.1043, Cooling tests**

Ignition timing and the mixture setting affect the cylinder and exhaust gas temperatures. The EEC may control one or both of these parameters as well as other parameters or functions that affect engine cooling.

The applicant must complete cooling tests to show that the critical temperature(s), including the EEC and its associated hardware, are acceptable. The applicant must consider each EEC parameter or function that affects cooling when establishing the critical temperature.

Ignition timing and spark may be variable and may have default modes of operation. The applicant must perform cooling tests with the EEC in any mode that is dispatchable. If there are Time Limited Dispatch (TLD) modes that allow certain reduced capability of the EEC, then those TLD modes must be tested. The additional testing will not be required if the applicant can demonstrate that the TLD modes do not affect either a parameter or a function that affects cooling.

EEC fuel enrichment may be creditable for compliance with cooling testing. The applicant must substantiate the EEC mitigation strategies for engine cooling before certification testing for any credit on engine cooling test results.

An example of evaluating the mitigation strategy is shown below:

$$\begin{aligned}
 \Delta CHT / \Delta W_{Fuel} &= 1^\circ F / \text{lbm/hr} \\
 \text{Measured Fuel Flow} &= 172 \text{ lbm/hr} \\
 \text{Target Fuel Flow} &= 155 \text{ lbm/hr (normal operation)} \\
 \text{Maximum Fuel Flow} &= 195 \text{ lbm/hr} \\
 \text{Measured CHT} &= 430^\circ F \\
 \text{Limit CHT} &= 450^\circ F \\
 \text{Measured OAT} &= 70^\circ F \\
 \text{Pressure Altitude} &= 5000 \text{ ft} \\
 \text{CHT Corrected} &= CHT + 1.0(100 - 0.0036(\text{Palt}) - \text{OAT}) \\
 &= 430 + 1.0(100 - 0.0036(5000) - 70) \\
 &= 442^\circ F \\
 \text{Fuel Cooling Correction} &= (W_{Fuel(\text{measured})} - W_{Fuel(\text{Target})}) * \Delta CHT / \Delta W_{Fuel} \\
 &= (172 - 155) * 1^\circ F / \text{lbm/hr} \\
 &= 17^\circ F \\
 \text{Fuel Corrected CHT} &= \text{CHT Corrected} + \text{Fuel Cooling Correction} \\
 &= 442^\circ F + 17^\circ F \\
 &= 459^\circ F \\
 \text{Max Fuel Cooling} &= (W_{Fuel(\text{maximum})} - W_{Fuel(\text{Target})}) * \Delta CHT / \Delta W_{Fuel} \\
 &= (195 - 155) * 1^\circ F / \text{lbm/hr} \\
 &= 40^\circ F \\
 \text{Max Fuel Cooling CHT} &= \text{Fuel Corrected CHT} - \text{Max Fuel Cooling} \\
 &= 459^\circ F - 40^\circ F \\
 &= 419^\circ F \\
 \text{CHT Margin} &= \text{CHT Limit} - \text{Max Fuel Cooling CHT} \\
 &= 450^\circ F - 419^\circ F \\
 &= 31^\circ F
 \end{aligned}$$

**(o) § 23.1047, Cooling test procedures for reciprocating engine powered airplanes**

The EEC control of the mixture and ignition timing will have an effect on the cooling performance. The applicant must review the EEC functions to determine if they affect cooling and address these functions during cooling tests.

**(p) § 23.1093, Induction system icing protection**

The applicant must verify each EEC controlled component and EEC control mode affecting induction system icing protection/air temperature control for proper operation and support it with substantiating data. Either flight testing, static testing, or analysis, or all, may be required. The applicant will have to substantiate any method of compliance with engineering data.

See § 23.1157 for related requirements.

Section 23.1309 is applicable.

**(q) § 23.1141, Powerplant controls: General**

An EEC installation may require an ELOS since the means for controlling the engine may be different from what is specifically written in this and subsequent engine control sections.

The requirements of § 23.1141(f) are applicable to EEC installation, as the effects of an engine/nacelle fire will have a direct impact on the EEC function. Any EEC components and associated wiring necessary to prevent a destructive engine event must be fire resistant. The EEC system may not burn such that it contributes to the fire hazard. The EEC system was evaluated for fire resistance during the part 33 engine certification program; therefore, evaluation of the effects of fire should be limited to components that are not part of the certificated engine.

See § 23.903 for related requirements concerning “graceful shutdown” in the event of engine/nacelle fire.

See § 23.1183 for related requirements.

Also refer to § 23.1305 and § 23.1309.

**(r) § 23.1143, Engine controls**

The use of a single power lever is envisioned with incorporation of an EEC. The EEC control interface must have at least a single power lever that controls engine power or thrust. EEC control of either super or turbo chargers is envisioned.

The applicant must account for the EEC effect on the engine controls. The EEC installation may introduce either single or other failure modes not present in the traditional throttle control system configuration. The EEC control interface with the engine may not be mechanical, but rather an electrical connection. The EEC is required to comply with this regulation, as it requires separate controls for each engine power or thrust control; however, an ELOS may be required to satisfy the requirements of § 23.1143(g).

An ELOS or special conditions may be warranted for EEC installations that combine control of the super or turbo chargers requiring a control and engine power.

**(s) § 23.1145, Ignition switches**

The applicant must provide a means to stop the engine; this may mean shutting off the EEC or appropriate components. Depending on specific system details, a special condition, exemption, or ELOS for § 23.1145 could be used. For EECs that supplement the magneto ignition, basic compliance would be acceptable as the traditional interface with the magneto ignition would still be present.

See § 23.1165 for related requirements.

**(t) § 23.1147, Mixture controls**

The existing requirements of this section are applicable to manual mixture controls, should they be included in the EEC configuration.

For EEC's incorporating mixture control, substantiating data must be consistent with the EEC's means of controlling mixture. EEC control of a single device mixture control for all engine cylinders in combined has different cooling and vibration ramifications than individually controlling the mixture for individual cylinders.

The applicant must provide a means to stop the engine; this may mean shutting off the EEC or appropriate components. Depending on specific system details, a special condition, exemption or ELOS for § 23.1147 could be used.

**(u) § 23.1149, Propeller speed and pitch controls**

The applicant must account for the EEC's effect on the propeller pitch and speed controls. Failure of the propeller speed and pitch control may lead to a destructive event of the engine or propeller. For EEC's that incorporate propeller control functions, verification of each EEC controlled component and EEC control mode affecting propeller speed and pitch control for proper operation should be addressed in the SICP.

Section 23.1309 is applicable in assessing the EEC control of the propeller speed and pitch control.

**(v) § 23.1153, Propeller feathering controls**

This requirement is the same as § 23.1149, except feather replaces speed and pitch.

**(w) § 23.1157, Carburetor air temperature controls**

For EECs that incorporate inlet air temperature controls, verification of each EEC controlled component and EEC control mode that affects inlet air temperature for proper operation should be addressed in the SICP.

See § 23.1093 for related requirements.

Section 23.1309 is applicable.

**(x) § 23.1163, Powerplant accessories**

Basic compliance with the regulation is acceptable. The installation instructions, as cited in § 23.901, should provide guidance to address the requirements.

**(y) § 23.1165, Engine ignition systems [Permanent electrical power]**

Engines equipped with an EEC that has no mechanical backup system, will need permanent electrical power in the manner of Battery Ignition Systems, as addressed in § 23.1165. The minimum requirement for the electrical power system is addressed in §§ 23.1309, 23.1351, 23.1353, 23.1357, 23.1359, 23.1361, 23.1365 and 23.1367.

**(z) § 23.1183, Lines, fittings and components**

Basic compliance with the regulation is acceptable.

**(aa) § 23.1191, Firewalls**

Basic compliance with the regulation is acceptable.

**(6) Subpart F -- Equipment**

**(a) § 23.1301, Function and installation**

EEC's have incorporated functions that are not required for certification. The applicant is required to show that the function(s) and associated failure(s) are not hazardous and that the functions are performed as intended. Part 33 certification is acceptable only for those functions that can be adequately addressed in their entirety by part 33 certification.

If the EEC manufacturer provides installation instructions and approved substantiation data showing compliance with the requirements of § 23.1301, then the applicant need not show additional compliance.

**(b) § 23.1305, Powerplant instruments**

The instrumentation requirements in § 23.1305 were written for conventional reciprocating engines and turbine engines. The requirement did not envision the use of EECs. Additional instrumentation may be necessary for a particular installation that is not specified in the current requirements or the engine installation manual.

The applicant is required to specify the necessary instrumentation for the EEC installation. If the aircraft engine limiting parameters are different from those specified in § 23.1521, special conditions will be developed to require those parameters to be used as limitations (see § 23.1521). The limiting parameters will be displayed in the instrument panel, as required by § 23.1305.

Special conditions will be developed if any additional items to those named in § 23.1305(b) are required.

Deviations from the requirements of § 23.1305(b) could be administered by an exemption, an equivalent level of safety, or in combination with any special conditions requiring additional parameters.

The EEC system will probably include some method of fault detection and engine parameter annunciation. The EEC may interface directly with the indicator or may require adding a separate interface unit. The interface unit would then be required to meet the requirements of § 23.1309 and its applicable special conditions.

See § 23.1322 for related requirements.

**(c) § 23.1307, Miscellaneous equipment**

Basic compliance with the regulation is acceptable.

**(d) § 23.1309, Equipment, systems and installations**

Since the EEC without mechanical backup requires permanent electrical power, the criticality of the power supply system may be higher than on a conventional magneto ignition system. The applicant is required to provide a Functional Hazard Assessment (FHA) and System Safety Assessment (SSA). The SSA has to address the power supply failure mode. If the electrical power after loss of the generation system is limited to a specific time (for example, if supplied by battery), this remaining time should be demonstrated and the information included in the AFM. The time required in § 23.1353(h) is the minimum time for FADEC backup electrical power in the event of a failure of available aircraft electrical power.

The intent of the installation of an EEC is to increase the reliability of the overall engine control system. The inherent redundancy of an independent power source for engine operation is a desirable feature when considering aircraft electrical power failure. Following the loss of the primary power generation system, a minimum of 60 minutes of backup electrical power for the EEC is highly recommended. The FHA, SSA combined with the EEC Safety Analysis (EECSA), as defined in AC 33.28-2, should result in an engine control system with greater reliability than the current magneto based systems. The probability of total failure of aircraft supplied power to the EEC must be shown to be lower than the probability of both magnetos failing.

In the event of a total aircraft power failure, the pilot must be informed in the AFM that the engine will stop if the electric power is lost and the engine is operated beyond the limits of the backup power.

The airplane system safety assessments provide the criticality and associated software development assurance level. Accomplishing this effort in a timely manner ensures that an adequate level of software development is used during engine selection/engine certification. Software developed and certified within part 33 to the correct assurance level does not establish part 23 certification of the software installation. Part 23 EEC functions without an equivalent part 33 requirement will be required to comply with 14 CFR, part 23, § 23.1301. Compliance requirements for EEC functions that are applicable to part 23 requirements should be addressed in the SICP document. Application of current AC 23.1309-1C guidance information will result in classifications of failure conditions and identify the DO-178B criticality of engine software required.

The part 23 installation may require a software level that is higher than that certificated to date in part 33. AC 23.1309-1C shows the software requirements for the various classes of aircraft. The minimum software certification level for an EEC is DO178B level C; however, aircraft defined as Class III or higher will require DO178B level B software. If the EEC equipped engine is certified under 14 CFR, part 33 with DO178B level C software, then a higher software certification level would be required to install this engine into a 14 CFR, part 23 aircraft in the Class III category.

The airplane FHA and SSA must also address either degraded or abnormal operating modes, or both, of the EEC. The FHA and SSA must include the effects of either the EEC degraded or abnormal operating mode on the aircraft system, or both, as a whole. One example would be loss of an Exhaust Gas Temperature (EGT) sensor resulting in full rich mixture and increased fuel consumption, and the possible reduction in available power. Should TLD be intended, early coordination by the applicant with the ACO is required to enable timely certification of both the engine and the airplane. The operational data reporting requirements for TLD are significant.

The indirect effects of lightning must be addressed. The applicant must specify the level of upset acceptable for the engine control aspects of the EEC as well as the additional functions and features of the EEC. For example, a lightning strike on an EEC equipped airplane may produce momentary interruptions of either the engine indications or engine operation, or both. The applicant must show that the interruptions of either the engine indications or engine operation, or both, do not cause an unsafe condition. Additionally, the applicant must show that the engine control functions recover the engine without hazard or increase to the crew workload.

The current Standards Office policy on EEC installation in small airplanes, under § 23.1309, has been to issue two special conditions. The first special condition applies § 23.1309(a) through (e) to the propulsion system installation. The second special condition is protection of the EEC from exposure to HIRF. The evaluation should be limited to the interfaces of the engine/control system and verification that none of the assumptions made for part 33 certification of the engine are invalidated by the installation. The analysis should not extend into data submitted and approved as part of the engine certification program.

Should additional electronic equipment be installed into the airplane once the EEC has been installed, the applicant must ensure that the additional equipment will not interfere with the EECs proper operation. The newly installed electronic equipment must not have radiated HIRF levels that exceed the levels to which the EEC system has been certified.

Examples of the two special conditions that have been issued follow:

### **1. Special Condition [§ 23.1309]**

The EEC system installation must comply with the requirements of § 23.1309(a) through (e). When showing compliance with this requirement, the reliability of the control system should either (1) be equivalent to or better than the reliability of the mechanical systems the control is replacing or (2) meet accepted § 23.1309 hardware reliability levels used for other airplane electronic systems. Software assurance levels used for the control should meet accepted § 23.1309 assurance levels used for other airplane electronic systems. When appropriate, engine certification data may be used when showing compliance with this requirement; however, the effects of the installation on this data must be addressed.

### **2. Special Condition [High Intensity Radiated Field (HIRF)]**

In showing compliance with 14 CFR, part 21, and the airworthiness requirements of 14 CFR, part 23 for protection against hazards

caused by the exposure to HIRF fields, electrical and electronic systems that perform critical functions must be considered. The hazards addressed include those that would result in a catastrophic failure condition to the airplane. To prevent this occurrence, airplane systems that perform critical functions must be designed and installed to ensure that the operation and operational capabilities of these critical systems are not adversely affected when the airplane is exposed to high-energy radio fields.

There is no specific regulation that addresses protection of electrical and electronic systems from HIRF; therefore, a special condition is necessary. The special condition will be written to ensure that each electrical and electronic system that performs critical functions is designed and installed properly. Proper design and installation means the operation and operational capabilities of the system to perform critical functions are not adversely affected when the airplane is exposed to HIRF external to the airplane. The term “critical” means those functions whose failure would contribute to, or cause, a failure condition that would prevent the continued safe flight and landing of the airplane. The critical functions may be determined using the FHA provided it is reviewed and approved by the FAA.

The FAA policy is contained in Notice 8110.71, dated April 2, 1998, which establishes the HIRF energy levels that airplanes will be exposed to in service. The guidelines set forth in this notice are the result of an Aircraft Certification Service review of existing policy on HIRF. The review occurred because of the continuing work of the Aviation Rulemaking Advisory Committee (ARAC) Electromagnetic Effects Harmonization Working Group (EEHWG).

The EEHWG adopted a set of HIRF environment levels in November 1997 that were agreed on by the FAA, Joint Aviation Authorities (JAA) and industry participants. As a result, the HIRF environments in this notice reflect the environment levels recommended by this working group. An issue paper must be written and must include how the airplane complies with HIRF and lightning requirements in accordance with Notice N8110.71, AC 23.1309-1C, and AC 23-17. Compliance with the HIRF requirements must address the airframe interface and installation of the HIRF approved engine. The installation issues of the EEC controlled engine into the airframe must be addressed. The applicant should specify what HIRF levels the engine was certified to and make a comparison of those requirement levels to the airplane in accordance with § 23.1309.

The FAA defines the following two acceptable methods for complying with the requirement for protection of systems that perform critical functions.

(aa) The applicant may demonstrate that the operation and operational capability of the installed electrical and electronic systems that perform critical

functions are not adversely affected when the aircraft is exposed to the external HIRF threat environment defined in the following table:

Frequency	Field Strength (volts per meter)	
	Peak	Average
10 kHz - 100 kHz	50	50
100 kHz - 500 kHz	50	50
500 kHz - 2 MHz	50	50
2 MHz - 30 MHz	100	100
30 MHz - 70 MHz	50	50
70 MHz - 100 MHz	50	50
100 MHz - 200 MHz	100	100
200 MHz - 400 MHz	100	100
400 MHz - 700 MHz	700	50
700 MHz - 1 GHz	700	100
1 GHz - 2 GHz	2000	200
2 GHz - 4 GHz	3000	200
4 GHz - 6 GHz	3000	200
6 GHz - 8 GHz	1000	200
8 GHz - 12 GHz	3000	300
12 GHz - 18 GHz	2000	200
18 GHz - 40 GHz	600	200
The field strengths are expressed in peak root-mean-square (rms) values.		

or,

(bb) The applicant may demonstrate by a system test and analysis that the electrical and electronic systems that perform critical functions can withstand a minimum threat of 100 volts per meter peak electrical strength, without the benefit of airplane structural shielding, in the frequency range of 10 KHz to 18 GHz. When using this test to show compliance with the HIRF requirements, no credit is given for signal attenuation due to installation.

**(e) § 23.1311, Electronic display instrument systems**

The EEC interaction with electronic display components ranges from no system interaction to EEC generation and supply of display information. Consequently, the range of system configuration is broad. The applicability of multiple requirements must be considered. Some of these requirements include the following: §§ 23.901, 23.903, 23.1141, 23.1305, 23.1309, and 23.1353.

**(f) § 23.1321, Arrangement and visibility**

Basic compliance with the regulation is acceptable.

**(g) § 23.1322, Warning, caution, and advisory lights**

The EEC installation requirements for warning, caution, and advisory lights need to be identified by the applicant in the installation instructions required by § 23.901 and in compliance with § 23.1322. This includes operation, advisory, and fault annunciation schemes.

See § 23.1305 for related requirements.

**(h) §§ 23.1331, 23.1337, 23.1351**

Basic compliance with the regulations is acceptable.

**(i) § 23.1353, Storage battery design and installation**

Engine configurations with dedicated EEC electrical power generation have been certified. The applicant must address the reliance, if any, on airframe electrical power and applicable certification requirements, including § 23.1353(h).

Engine configurations without dedicated EEC electrical power have been certificated and, as a result, require reliance on airframe electrical power (and batteries) to enable compliance with § 23.1353(h). For aircraft with operations within close distance of suitable landing sites, engine operation that relies on backup battery duration may be sufficient. For aircraft with intended operations that are a significant flight time from a suitable landing site, the FAA recommends that the airplane be configured such that engine operation does not rely on airframe electrical sources.

The time required in § 23.1353(h) is the minimum time for FADEC backup electrical power in the event of a failure of available aircraft electrical power. The intent of the installation of an EEC is to increase the reliability of the overall engine control system. The inherent redundancy of an independent power source for engine operation is a desirable feature when

considering aircraft electrical power failure. Following the loss of the primary power generation system, a minimum of 60 minutes of backup electrical power for the EEC is highly recommended. The FHA, SSA combined with the EECSA, as defined in AC 33.28-2, should result in an engine control system with greater reliability than the current magneto based systems. The probability of total failure of aircraft supplied power to the EEC must be shown to be lower than the probability of both magnetos failing.

See § 23.1165 for related requirements.

**(j) § 23.1357, Circuit protective devices**

The EEC installation must include guidance on the ability to reset any circuit breakers, the applicability of the reset, and a limit on the number of times a circuit breaker can be reset before any maintenance action. The instructions for circuit breaker reset, and any limitations, must be in the AFM, and must comply with § 23.1521.

**(k) §§ 23.1359, 23.1361, 23.1365, 23.1367, 23.1381, 23.1431, 23.1437**

Basic compliance with the regulations is acceptable.

**(7) Subpart G -- Operating Limitations and Information**

**(a) § 23.1501, General**

Basic compliance with the regulation is acceptable.

**(b) § 23.1521, Powerplant limitations**

The applicant must define any EEC associated limitations and provide the pilot with a means of ensuring that the EEC is operated within those limitations. The applicant must define the dispatchable condition of the EEC installation, and those dispatchable configuration(s) for an EEC installation must be certified. Fault conditions considered dispatchable must be considered from the airplane perspective that also includes the engine limitations. TLD operations must also be considered if they are intended.

If the aircraft engine limiting parameters are different from those specified in § 23.1521, special conditions will be developed to require those parameters to be used as limitations. The limiting parameters will be displayed in the instrument panel, as required by § 23.1305.

See § 23.1305 and § 23.1322 for related requirements.

**(c) §§ 23.1525, 23.1527**

Basic compliance with the regulations is acceptable.

**(d) § 23.1529, Instructions for continued airworthiness**

EEC functions will include basic engine operation. The EEC may also include fault detection, engine condition and performance, and other auxiliary functions. The applicant is required to provide Instructions for Continued Airworthiness (ICAs), and the instructions must address the EEC installation in its entirety. Specific guidance for fault resolution and disposition of any TLD conditions must be included.

**(e) §§ 23.1541, 23.1543, 23.1549, 23.1555, 23.1559**

Basic compliance with the regulations is acceptable.

**(f) § 23.1581, General**

The applicant must include EEC annunciations and associated limits in the AFM. Not all EEC annunciations belong in the cockpit. However, the AFM must include all flight crew related, cockpit-displayed annunciations. Additional EEC annunciations, such as maintenance diagnostic data, may be included in the AFM or in a supplemental document such as a maintenance manual.

**(g) § 23.1583, Operating limitations**

The applicant must include the EEC related limitations in the Operating Limitations section of the AFM. EEC unique operating limits, such as degraded mode of operation, if applicable, must be included in the operating limitations.

**(h) § 23.1585, Operating procedures**

The applicant must include the EEC related operating procedures in the Operating Procedures section of the Airplane Flight Manual. EEC unique operating procedures, such as a power-up, self-test, and channel switching, if applicable, must be included in the operating procedures.

**(i) § 23.1587, Performance information**

The applicant must include, in the Performance Information section, any EEC installation effects of EEC dispatchable modes that result in degraded engine performance. One example of this would be the dispatchable

EEC degraded mode where the fuel mixture is at its full rich setting, resulting in a reduction in engine power.

## **5. Effect of Policy**

The general policy stated in this document does not constitute a new regulation or create what the courts refer to as a "binding norm." The office that implements policy should follow this policy when applicable to the specific project. Whenever an applicant's proposed method of compliance is outside this established policy, it must be coordinated with the policy issuing office, for example, through the issue paper process or equivalent. Similarly, if the implementing office becomes aware of reasons that an applicant's proposal that meets this policy should not be approved, the office must coordinate its response with the policy issuing office.

Applicants should expect that the certificating officials will consider this information when making findings of compliance relevant to new certificate actions. Also, as with all advisory material, this policy statement identifies one means, but not the only means, of compliance.

DRAFT

Dorenda D. Baker  
Manager, Small Airplane Directorate  
Aircraft Certification Service

Appendix A  
Generic List of Certification Regulations Applicable to EEC Installations

14 CFR Part and Section	Subpart A – General	Guidance
	23.1 Applicability.	See paragraph for guidance.
	23.2 Special retroactive requirements.	
	23.3 Airplane categories.	
	Subpart B -- Flight	
	GENERAL	
	23.21 Proof of compliance.	See paragraph for guidance.
	23.23 Load distribution limits.	
	23.25 Weight limits.	
	23.29 Empty weight and corresponding center of gravity.	
	23.31 Removable ballast.	
	23.33 Propeller speed and pitch limits.	
	PERFORMANCE	
	23.45 General.	See paragraph for guidance. See AC 23-8B for additional guidance.
	23.49 Stalling period.	See paragraph for guidance. See AC 23-8B for additional guidance.
	23.51 Takeoff speeds.	See paragraph for guidance. See AC 23-8B for additional guidance.
	23.53 Takeoff performance.	
	23.55 Accelerate-stop distance.	
	23.57 Takeoff path.	
	23.59 Takeoff distance and takeoff run.	
	23.61 Takeoff flight path.	
	23.63 Climb: General.	
	23.65 Climb: All engines operating.	
	23.66 Takeoff climb: One-engine inoperative.	See paragraph for guidance. See AC 23-8B for additional guidance.
	23.67 Climb: One engine inoperative.	

- 23.69 Enroute climb/descent.
- 23.71 Glide: Single-engine airplanes.
- 23.73 Reference landing approach speed.
- 23.75 Landing distance.

23.77 Balked landing. See paragraph for guidance. See AC 23-8B for additional guidance

## FLIGHT CHARACTERISTICS

- 23.141 General.

## CONTROLLABILITY AND MANEUVERABILITY

- 23.143 General.
- 23.145 Longitudinal control.
- 23.147 Directional and lateral control.
- 23.149 Minimum control speed.
- 23.151 Acrobatic maneuvers.
- 23.153 Control during landings.
- 23.155 Elevator control force in maneuvers.
- 23.157 Rate of roll.

## TRIM

- 23.161 Trim.

## STABILITY

- 23.171 General.
- 23.173 Static longitudinal stability.
- 23.175 Demonstration of static longitudinal stability.
- 23.177 Static directional and lateral stability.
- 23.181 Dynamic stability.

## STALLS

- 23.201 Wings level stall.
- 23.203 Turning flight and accelerated turning stalls.
- 23.207 Stall warning.

#### SPINNING

- 23.221 Spinning.

#### GROUND AND WATER HANDLING CHARACTERISTICS

- 23.231 Longitudinal stability and control.
- 23.233 Directional stability and control.
- 23.235 Operation on unpaved surfaces.
- 23.237 Operation on water.
- 23.239 Spray characteristics.

#### MISCELLANEOUS FLIGHT REQUIREMENTS

- 23.251 Vibration and buffeting.
- 23.253 High speed characteristics.

### **Subpart C -- Structure**

#### GENERAL

- |  |   |
|--|---|
| 23.301 Loads.                                | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.302 Canard or tandem wing configurations. |   |
| 23.303 Factor of safety.                     | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.305 Strength and deformation.             | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.307 Proof of structure.                   | Basic Compliance. See AC 23-19 for additional guidance. |

#### FLIGHT LOADS

## 23.321 General.

Basic Compliance. See AC 23-19 for additional guidance.

- 23.331 Symmetrical flight conditions.
- 23.333 Flight envelope.
- 23.335 Design airspeeds.
- 23.337 Limit maneuvering load factors.
- 23.341 Gust loads factors.
- 23.343 Design fuel loads.
- 23.345 High lift devices.
- 23.347 Unsymmetrical flight conditions.
- 23.349 Rolling conditions.
- 23.351 Yawing conditions.
- 23.361 Engine torque.
- 23.363 Side load on engine mount.
- 23.365 Pressurized cabin loads.
- 23.367 Unsymmetrical loads due to engine failure.
- 23.369 Rear lift truss.
- 23.371 Gyroscopic and aerodynamic loads.
- 23.373 Speed control devices.

## CONTROL SURFACE AND SYSTEM LOADS

- 23.391 Control surface loads.
- 23.393 Loads parallel to hinge line.
- 23.395 Control system loads.
- 23.397 Limit control forces and torques.
- 23.399 Dual control system.
- 23.405 Secondary control system.
- 23.407 Trim tab effects.
- 23.409 Tabs.
- 23.415 Ground gust conditions.

## HORIZONTAL STABILIZING AND BALANCING SURFACES

- 23.421 Balancing loads.

- 23.423 Maneuvering loads.
- 23.425 Gust loads.
- 23.427 Unsymmetrical loads.

#### VERTICAL SURFACES

- 23.441 Maneuvering loads.
- 23.443 Gust loads.
- 23.445 Outboard fins or winglets.

#### AILERONS AND SPECIAL DEVICES

- 23.455 Ailerons.
- 23.459 Special devices.

#### GROUND LOADS

- 23.471 General.
- 23.473 Ground load conditions and assumptions.
- 23.477 Landing gear arrangement.
- 23.479 Level landing conditions.
- 23.481 Tail down landing conditions.
- 23.483 One-wheel landing conditions.
- 23.485 Side load conditions.
- 23.493 Braked roll conditions.
- 23.497 Supplementary conditions for tail wheels.
- 23.499 Supplementary conditions for nose wheels.
- 23.505 Supplementary conditions for ski-planes.
- 23.507 Jacking loads.
- 23.509 Towing loads.
- 23.511 Ground load; unsymmetrical loads on multiple-wheel units.

#### WATER LOADS

- 23.521 Water load conditions.
- 23.523 Design weights and center of gravity positions.
- 23.525 Application of loads.
- 23.527 Hull and main float load factors.
- 23.529 Hull and main float landing conditions.
- 23.531 Hull and main float takeoff condition.
- 23.533 Hull and main float bottom pressures.
- 23.535 Auxiliary float loads.
- 23.537 Seawing loads.

#### EMERGENCY LANDING CONDITIONS

- 23.561 General.
- 23.562 Emergency landing dynamic conditions.

#### FATIGUE EVALUATION

- 23.571 Metallic pressurized cabin structures.
- 23.572 Metallic wing, empennage, and associated structures.
- 23.573 Damage tolerance and fatigue evaluation of structure.
- 23.574 Metallic damage tolerance and fatigue evaluation of commuter category airplanes.
- 23.575 Inspections and other procedures.

#### Subpart D -- Design and Construction

- |  |   |
|--|---|
| 23.601 General.  | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.603 Materials and workmanship.                      | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.605 Fabrication methods.                            | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.607 Fasteners.                                      | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.609 Protection of structure.                        | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.611 Accessibility provisions.                       | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.613 Material strength properties and design values. | Basic Compliance. See AC 23-19 for additional guidance. |
| 23.619 Special factors.                                |   |
| 23.621 Casting factors.                                |   |

23.623 Bearing factors.  
23.625 Fitting factors.  
23.627 Fatigue strength.  
23.629 Flutter.

#### WINGS

23.641 Proof of strength.

#### CONTROL SURFACES

23.651 Proof of strength.  
23.655 Installation.  
23.657 Hinges.  
23.659 Mass balance.

#### CONTROL SYSTEMS

23.671 General.  
23.672 Stability augmentation and automatic and power-operated systems.  
23.673 Primary flight controls.  
23.675 Stops.  
23.677 Trim systems.  
23.679 Control system locks.  
23.681 Limit load static tests.  
23.683 Operation tests.  
23.685 Control system details.  
23.687 Spring devices.  
23.689 Cable systems.  
23.691 Artificial stall barrier system.  
23.693 Joints.  
23.697 Wing flap controls.  
23.699 Wing flap position indicator.  
23.701 Flap interconnection.

23.703 Takeoff warning system.

#### LANDING GEAR

23.721 General.

23.723 Shock absorption tests.

23.725 Limit drop tests.

23.726 Ground load dynamic tests.

23.727 Reserve energy absorption drop test.

23.729 Landing gear extension and retraction system.

23.731 Wheels.

23.733 Tires.

23.735 Brakes.

23.737 Skis.

23.745 Nose/tail wheel steering.

#### FLOATS AND HULLS

23.751 Main float buoyancy.

23.753 Main float design.

23.755 Hulls.

23.757 Auxiliary floats.

#### PERSONNEL AND CARGO ACCOMMODATIONS

23.771 Pilot compartment.

23.773 Pilot compartment view.

23.775 Windshields and windows.

23.777 Cockpit controls. \*

See paragraph. See AC 23-17A for additional guidance.

23.779 Motion and effect of cockpit controls. \*

See paragraph. See AC 23-17A for additional guidance.

23.781 Cockpit control knob shape. \*

See paragraph. See AC 23-17A for additional guidance.

23.783 Doors.

23.785 Seats, berths, litters, safety belts, and shoulder harnesses.

23.787 Baggage and cargo compartments.

23.791 Passenger information signs.  
23.803 Emergency evacuation.  
23.805 Flightcrew emergency exits.  
23.807 Emergency exits.  
23.811 Emergency exit marking.  
23.812 Emergency lighting.  
23.813 Emergency exit access.  
23.815 Width of aisle.  
23.831 Ventilation.

#### PRESSURIZATION

23.841 Pressurized cabins.  
23.843 Pressurization tests.

#### FIRE PROTECTION

23.851 Fire extinguishers.  
23.853 Passenger and crew compartment interiors.  
23.855 Cargo and baggage compartment fire protection.  
23.859 Combustion heater fire protection.  
23.863 Flammable fluid fire protection.  
23.865 Fire protection of flight controls, engine mounts, and other flight structure.

#### ELECTRICAL BONDING AND LIGHTNING PROTECTION

23.867 Electrical bonding and protection against lightning and static electricity.	See paragraph. See AC 23-17A for additional guidance.
--	---

#### MISCELLANEOUS

23.871 Leveling means.

### Subpart E -- Powerplant

## GENERAL

23.901 Installation.	See paragraph. See AC 23-16A for additional guidance.
23.903 Engines.	See paragraph. See AC 23-16A for additional guidance.
23.904 Automatic power reserve system.	See paragraph. See AC 23-16A for additional guidance.
23.905 Propellers.	
23.907 Propeller vibration.	See paragraph. See AC 23-16A for additional guidance.
23.909 Turbocharger systems.	See paragraph. See AC 23-16A for additional guidance.
23.925 Propeller clearance.	
23.929 Engine installation ice protection.	
23.933 Reversing systems.	See paragraph. See AC 23-16A for additional guidance.
23.934 Turbojet and turbofan engine thrust reverser systems tests.	
23.937 Turbopropeller-drag limiting systems.	
23.939 Powerplant operating characteristics. *	See paragraph. See AC 23-16A for additional guidance.
23.943 Negative acceleration.	

## FUEL SYSTEM

23.951 General.	
23.953 Fuel system independence.	
23.954 Fuel system lightning protection.	
23.955 Fuel flow.	Basic compliance. See AC 23-16A for additional guidance.
23.957 Flow between interconnected tanks.	
23.959 Unusable fuel supply.	
23.961 Fuel system hot weather operation.	
23.963 Fuel tanks: General.	
23.965 Fuel tank tests.	
23.967 Fuel tank installation.	
23.969 Fuel tank expansion space.	
23.971 Fuel tank sump.	
23.973 Fuel tank filler connection.	
23.975 Fuel tank vents and carburetor vapor vents.	
23.977 Fuel tank outlet.	

23.979 Pressure fueling systems.

#### FUEL SYSTEM COMPONENTS

23.991 Fuel pumps.	See paragraph. See AC 23-16A for additional guidance.
23.993 Fuel system lines and fittings.	Basic compliance. See AC 23-16A for additional guidance.
23.994 Fuel system components.	
23.995 Fuel valves and controls.	
23.997 Fuel strainer or filter.	Basic compliance. See AC 23-16A for additional guidance.
23.999 Fuel system drains.	
23.1001 Fuel jettisoning system.	

#### OIL SYSTEM

23.1011 General.	
23.1013 Oil tanks.	
23.1015 Oil tank tests.	
23.1017 Oil lines and fittings.	
23.1019 Oil strainer or filter.	
23.1021 Oil system drains.	
23.1023 Oil radiators.	
23.1027 Propeller feathering system.	Basic compliance. See AC 23-16A for additional guidance.

#### COOLING

23.1041 General.	See paragraph. See AC 23-16A for additional guidance.
23.1043 Cooling tests.	See paragraph. See AC 23-16A for additional guidance.
23.1045 Cooling test procedures for turbine engine powered airplanes.	
23.1047 Cooling test procedures for reciprocating engine powered airplanes.	See paragraph. See AC 23-16A for additional guidance.

#### LIQUID COOLING

23.1061 Installation.	
23.1063 Coolant tank tests.	

## INDUCTION SYSTEM

23.1091 Air induction system.

23.1093 Induction system icing protection. See paragraph. See AC 23-16A for additional guidance.

23.1095 Carburetor deicing fluid flow rate.

23.1097 Carburetor deicing fluid system capacity.

23.1099 Carburetor deicing fluid system detail design.

23.1101 Induction air preheater design.

23.1103 Induction system ducts.

23.1105 Induction system screens.

23.1107 Induction system filters.

23.1109 Turbocharger bleed air system.

23.1111 Turbine engine bleed air system.

## EXHAUST SYSTEM

23.1121 General.

23.1123 Exhaust system.

23.1125 Exhaust heat exchangers.

## POWERPLANT CONTROLS AND ACCESSORIES

23.1141 Powerplant controls: General. See paragraph. See AC 23-16A for additional guidance.

23.1142 Auxiliary power unit controls.

23.1143 Engine controls. \* See paragraph. See AC 23-16A for additional guidance.

23.1145 Ignition switches. \* See paragraph. See AC 23-16A for additional guidance.

23.1147 Mixture controls. \* See paragraph. See AC 23-16A for additional guidance.

23.1149 Propeller speed and pitch controls. See paragraph. See AC 23-16A for additional guidance.

23.1153 Propeller feathering controls. See paragraph. See AC 23-16A for additional guidance.

23.1155 Turbine engine reverse thrust and propeller pitch settings  
below the flight regime.

23.1157 Carburetor air temperature controls. See paragraph.

23.1163 Powerplant accessories. See paragraph. See AC 23-16A for additional guidance.

23.1165 Engine ignition systems. See paragraph. See AC 23-16A and AC 23-17A for additional guidance.

## POWERPLANT FIRE PROTECTION

23.1181 Designated fire zones; regions included.

23.1182 Nacelle areas behind firewalls.

23.1183 Lines, fittings, and components.

Basic compliance. See AC 23-16A for additional guidance.

23.1189 Shutoff means.

23.1191 Firewalls.

Basic compliance. See AC 23-16A for additional guidance.

23.1192 Engine accessory compartment diaphragm.

23.1193 Cowling and nacelle.

23.1195 Fire extinguishing systems.

23.1197 Fire extinguishing agents.

23.1199 Extinguishing agent containers.

23.1201 Fire extinguishing systems materials.

23.1203 Fire detector system.

**Subpart F -- Equipment**

## GENERAL

23.1301 Function and installation.

See paragraph. See AC 23-17A for additional guidance.

23.1303 Flight and navigation instruments.

23.1305 Powerplant instruments. \*

See paragraph. See AC 23-17A and AC 23.1311-1A for additional guidance.

23.1307 Miscellaneous equipment.

Basic compliance.

23.1309 Equipment, systems, and installations. \*

See paragraph. See AC 23-17A and AC23.1309-1C for additional guidance.

## INSTRUMENTS: INSTALLATION

23.1311 Electronic display instrument systems.

See paragraph. See AC 23-17A for additional guidance.

23.1321 Arrangement and visibility.

Basic compliance. See AC 23-17A for additional guidance.

23.1322 Warning, caution, and advisory lights.

See paragraph. See AC 23-17A for additional guidance.

23.1323 Airspeed indicating system.

23.1325 Static pressure system.

23.1326 Pitot heat indication systems.

23.1327 Magnetic direction indicator.

23.1329 Automatic pilot system.

23.1331 Instruments using a power source. Basic compliance. See AC 23-17A for additional guidance.

23.1335 Flight director systems.

23.1337 Powerplant instruments installation. Basic compliance. See AC 23-17A for additional guidance.

## ELECTRICAL SYSTEMS AND EQUIPMENT

23.1351 General. Basic compliance. See AC 23-17A for additional guidance.

23.1353 Storage battery design and installation. See paragraph. See AC 23-17A for additional guidance.

23.1357 Circuit protective devices. See paragraph. See AC 23-17A for additional guidance.

23.1359 Electrical system fire protection. Basic compliance. See AC 23-17A for additional guidance.

23.1361 Master switch arrangement. Basic compliance. See AC 23-17A for additional guidance.

23.1365 Electric cables and equipment. Basic compliance. See AC 23-17A for additional guidance.

23.1367 Switches. Basic compliance. See AC 23-17A for additional guidance.

## LIGHTS

23.1381 Instrument lights. Basic compliance. See AC 23-17A for additional guidance.

23.1383 Taxi and landing lights.

23.1385 Position light system installation.

23.1387 Position light system dihedral angles.

23.1389 Position light distribution and intensities.

23.1391 Minimum intensities in the horizontal plane of position lights.

23.1393 Minimum intensities in any vertical plane of position lights.

23.1395 Maximum intensities in overlapping beams of position lights.

23.1397 Color specifications.

23.1399 Riding light.

23.1401 Anticollision light system.

## SAFETY EQUIPMENT

23.1411 General.

23.1415 Ditching equipment.

- 23.1416 Pneumatic de-icer boot system.
- 23.1419 Ice protection.

#### MISCELLANEOUS EQUIPMENT

- |  |  |
|--|--|
| 23.1431 Electronic equipment.                            | Basic compliance. See AC 23-17A for additional guidance. |
| 23.1435 Hydraulic systems.                               |  |
| 23.1437 Accessories for multiengine airplanes.           | Basic compliance. See AC 23-17A for additional guidance. |
| 23.1438 Pressurization and pneumatic systems.            |  |
| 23.1441 Oxygen equipment and supply.                     |  |
| 23.1443 Minimum mass flow of supplemental oxygen.        |  |
| 23.1445 Oxygen distribution system.                      |  |
| 23.1447 Equipment standards for oxygen dispensing units. |  |
| 23.1449 Means for determining use of oxygen.             |  |
| 23.1450 Chemical oxygen generators.                      |  |
| 23.1451 Fire protection for oxygen equipment.            |  |
| 23.1453 Protection of oxygen equipment from rupture.     |  |
| 23.1457 Cockpit voice recorders.                         |  |
| 23.1459 Flight recorders.                                |  |
| 23.1461 Equipment containing high energy rotors.         |  |

#### Subpart G -- Operating Limitations and Information

- |  |   |
|--|---|
| 23.1501 General.                                 | Basic compliance. See AC 23-8B for additional guidance. |
| 23.1505 Airspeed limitations.                    |   |
| 23.1507 Operating maneuvering speed.             |   |
| 23.1511 Flap extended speed.                     |   |
| 23.1513 Minimum control speed.                   |   |
| 23.1519 Weight and center of gravity.            |   |
| 23.1521 Powerplant limitations. *                | See paragraph. See AC 23-8B for additional guidance.    |
| 23.1522 Auxiliary power unit limitations.        |   |
| 23.1523 Minimum flight crew.                     |   |
| 23.1524 Maximum passenger seating configuration. |   |
| 23.1525 Kinds of operation.                      | Basic compliance. See AC 23-8B for additional guidance. |

23.1527 Maximum operating altitude.	Basic compliance. See AC 23-8B for additional guidance.
23.1529 Instructions for Continued Airworthiness.	See paragraph.

#### MARKINGS AND PLACARDS

23.1541 General.	Basic compliance. See AC 23-8B for additional guidance.
23.1543 Instrument markings: General.	Basic compliance. See AC 23-8B for additional guidance.
23.1545 Airspeed indicator.	
23.1547 Magnetic direction indicator.	
23.1549 Powerplant and auxiliary power unit instruments.	Basic compliance. See AC 23-8B for additional guidance.
23.1551 Oil quantity indicator.	
23.1553 Fuel quantity indicator.	
23.1555 Control markings.	Basic compliance. See AC 23-8B for additional guidance.
23.1557 Miscellaneous markings and placards.	
23.1559 Operating limitations placard.	Basic compliance. See AC 23-8B for additional guidance.
23.1561 Safety equipment.	
23.1563 Airspeed placards.	
23.1567 Flight maneuver placard.	

#### AIRPLANE FLIGHT MANUAL AND APPROVED MANUAL MATERIAL

23.1581 General.	See paragraph. See AC 23-8B for additional guidance.
23.1583 Operating limitations.	See paragraph. See AC 23-8B for additional guidance.
23.1585 Operating procedures.	See paragraph. See AC 23-8B for additional guidance.
23.1587 Performance information.	See paragraph. See AC 23-8B for additional guidance.
23.1589 Loading information.	

## Appendix B

## Example of an Issue Paper for a Special Condition

# ***ISSUE PAPER***

**PROJECT:** Applicant Technology, Inc  
Models M-1, M-2  
Project No. XXXXXX

**ITEM:** XX-1

**STAGE:** 2

**REG. REF.:** 14 CFR Parts 11, 21, and 23; 14 CFR  
Sections 21.16, 21.17, 21.21(b)(2), 23.1301, 23.1305,  
23.1309, 23.1311, 23.1321, 23.1322, 23.1331, 23.1529,  
CAR 3.411, 3.652, 3.655

**DATE:**  
**PAGE:** 1

**NATIONAL POLICY REF:** FAA Policy Statement;  
Installation of Engine Electronic Engine Control For  
Reciprocating Engine; PS-ACE100-2004-10024, FAA Notice  
N8110.71: Guidance for the Certification of Aircraft Operating  
in High Intensity Radiated Field (HIRF) Environments, dated  
April 2, 1998 and AC 23.1309-1C

**ISSUE STATUS:** Open

**SUBJECT:** High Intensity Radiated Fields (HIRF)  
Protection for the Applicant Technology EEC

**BRANCH ACTION:** ACE-  
110, 111, 112

**COMPLIANCE**  
**TARGET:** Pre-STC

## **FADEC- HIRF – SPECIAL CONDITION**

**STATEMENT OF ISSUE:** Applicant Technology has requested an amendment to Type Certificate XXXX to include Models M-1 and M-2. The proposed engine installation for these new models is the Engine Products E-1 engine, which includes a Full Authority Digital Electronic Control (FADEC) system, also known as an Electronic Engine Control (EEC). The FADEC system performs critical functions, such as the control of the ignition and fuel injection functions throughout the operational envelope.

The applicable 14 CFR, part 21 and 14 CFR, part 23 airworthiness regulations for general aviation airplanes, including 14 CFR, part 23, §§ 23.1301 and 23.1309, do not adequately

consider failures due to the effects of High Intensity Radiated Fields (HIRF) on electrical and electronic systems that perform critical functions. Therefore, a special condition is proposed to provide HIRF protection for any electrical and electronic components that may be installed in the Applicant Technology M-1 and M-2.

### **BACKGROUND:**

Changes in technology have given rise to advanced airplane electrical and electronic systems and more frequent use of high-energy radio frequency transmitters, such as radio and television broadcast stations, radar, and satellite uplink transmitters. The combined effect of these developments has been an increased susceptibility of electrical and electronic systems to the negative effects of electromagnetic fields.

Many advanced electronic systems, which perform critical functions, are prone to upsets and/or damage at energy levels lower than the analog systems previously used to perform the same functions. The use of composites has also increased the susceptibility of electronic systems to HIRF effects, since composites structures do not provide the same level of shielding as metal structure. For critical systems, provisions for protection from the effects of HIRF fields should be considered, and if necessary, incorporated into the original aircraft design data.

The Applicant Technology airplanes will incorporate an electronic engine control system that includes sensors, harnesses, and multi-port fuel injection systems required to control the fuel and ignition systems throughout the operational envelope. The functions of the FADEC are considered critical. Additionally, the FADEC system may be susceptible to disruption of both command/response/engine health-monitoring signals as a result of electrical and magnetic interference. This disruption of signals could result in the loss of critical engine functions, flight displays and annunciations, or present misleading information, including the health of the engine, to the pilot.

### **FAA POSITION:**

In showing compliance with 14 CFR, part 21 and the airworthiness requirements of 14 CFR, part 23, the protection of critical electrical and electronic systems against hazards caused by the exposure to HIRF fields must be considered. The hazards addressed include those that would result in a catastrophic failure condition to the airplane. To prevent such failures, airplane systems that perform critical functions must be designed and installed to ensure the operation and operational capabilities of these critical systems are not adversely affected when the airplane is exposed to HIRF.

The term “critical” refers to those functions whose failure would contribute to, or cause, a failure condition that would prevent the continued safe flight and landing of the airplane. The critical functions may be determined using the Functional Hazard Assessment (FHA) provided it is reviewed and approved by the FAA.

Existing FAA policy regarding HIRF is contained in Notice 8110.71, dated April 2, 1998, which establishes the energy levels that airplanes will be exposed to in service. The guidelines set forth in this notice are the result of an Aircraft Certification Service review of existing policy on HIRF, in light of the ongoing work of the ARAC Electromagnetic Effects Harmonization Working Group (EEHWG). The EEHWG adopted a set of HIRF environment levels in November 1997, which were agreed upon by the FAA, JAA and industry participants. As a result, the HIRF environments in this notice reflect the environment levels recommended by this working group.

Compliance with the HIRF requirements must address the installation issues of the FADEC and the engine itself into the airframe, such as proper grounding and strapping of the HIRF compliant engine. The applicant should specify what HIRF levels the engine was certified to and make a comparison of those requirement levels to the airplane IAW §§ 23.1309. Also, the continued integrity of the HIRF requirements for the approved engine and installation must be addressed. The applicant must prepare and deliver with each aircraft Instructions for Continued Airworthiness containing information that assures the continued HIRF compliance and integrity of the engine.

At this time the FAA and other airworthiness authorities are unable to precisely define or control the HIRF energy level to which the airplane will be exposed in service. Therefore, the FAA hereby defines two acceptable interim methods for complying with the requirement for protection of systems that perform critical functions.

- (1) The applicant may demonstrate that the operation and operational capability of the installed electrical and electronic systems that perform critical functions are not adversely affected when the aircraft is exposed to the external HIRF threat environment defined in the following table:

Frequency	Field Strength (volts per meter)	
	Peak	Average
10 kHz - 100 kHz	50	50
100 kHz - 500 kHz	50	50
500 kHz - 2 MHz	50	50
2 MHz - 30 MHz	100	100
30 MHz - 70 MHz	50	50
70 MHz - 100 MHz	50	50
100 MHz - 200 MHz	100	100
200 MHz - 400 MHz	100	100
400 MHz - 700 MHz	700	50
700 MHz - 1 GHz	700	100
1 GHz - 2 GHz	2000	200
2 GHz - 4 GHz	3000	200
4 GHz - 6 GHz	3000	200
6 GHz - 8 GHz	1000	200
8 GHz - 12 GHz	3000	300
12 GHz - 18 GHz	2000	200
18 GHz - 40 GHz	600	200
The field strengths are expressed in terms of peak root-mean-square (rms) values.		

or,

(2) The applicant may demonstrate by a system test and analysis that the electrical and electronic systems that perform critical functions can withstand a minimum threat of 100 volts per meter peak electrical strength, without the benefit of airplane structural shielding, in the frequency range of 10 KHz to 18 GHz. When using this test to show compliance with the HIRF requirements, no credit is given for signal attenuation due to installation. For VFR rotorcraft, 200 volts per meter is required for the peak electrical strength.

If other critical systems are installed (now or at a later date), such as an Electronic Flight Instrument System (EFIS), the applicant should identify these systems and incorporate them into this issue paper regarding how compliance to the HIRF requirements will be determined.

#### **APPLICANT POSITION:**

#### **CONCLUSION:**

Special conditions for HIRF protection for the electrical and electronic systems which perform critical functions will be written for the Applicant Technology M-1 and M-2 in accordance with the guidelines set forth in Action Notice 8110.71, dated April 2, 1998.

**CONTACTS:****Technical Coordination**

## Project Team Specialists

Branch					
Name					
Initials					
Date					

## Directorate Engineering

Branch					
Name					
Initials					
Date					

**Management Coordination**

## ACO Management

Branch					
Name					
Initials					
Date					

## Small Airplane Directorate Management

Branch					
Name					
Initials					
Date					